## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,	)
JOSE RAMIREZ, CLEMENTE HERNANDEZ,	)
CESAR PIZARO, ELISON PENA,	)
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,	)
ANGEL BAEZ, ANTONIO MARTINEZ,	)
WILFREDO ORTIZ, EULOGIO ORTIZ,	)
MIRRAIN MIRANDA, RAFAEL MORENO,	
NELSON ACEVEDO, and	)
RAMON RODRIQUEZ,	)
	) Civil Action No.
Plaintiffs,	) 04-10892-JLT
	)
v.	)
	)
SHERMAN-FEINBERG CORPORATION,	)
FARNSWORTH FIBRE CORPORATION,	)
UNITED STEELWORKERS OF AMERICA,	)
LOCAL 421-U, and UNITED STEELWORKERS	)
OF AMERICA,	)
Defendants.	)
	)

## MOTION TO ADMIT ATTORNEY ROBERT ALEXANDER PRO HAC VICE-

The undersigned, an attorney in good standing in the Commonwealth of Massachusetts respectfully requests that this Honorable Court admit Attorney Robert Alexander of the law firm of Bredhoff & Kaiser of Washington, D.C., for the purpose of entering an appearance and prosecuting the case on behalf on the Defendants. Attorney Alexander is an attorney in good standing in the District of Columbia Court of Appeals, as is evidenced by the Affidavit of Robert Alexander attached hereto.

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel certifies that counsel for the Defendant United Steelworkers, Local 421-U and United Steelworkers conferred by telephone with counsel for Plaintiffs concerning the instant motion. Attorney John Lee Diaz stated that he had no objection to the relief requested in this motion. Attorney Robert O. Berger stated that he was unsatisfied that there had been a good-faith attempt to confer and resolve this matter.

Respectfully submitted,

Dated: March 1, 2006

Harold L. Lichten, BBO # 549689 Alfred Gordon, BBO # 630456 Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C. 18 Tremont St., Ste. 500 Boston, MA 02108 (617) 367-7200

## CERTIFICATE OF SERVICE

I hereby certify that, in addition to electronic filing, a true copy of the above Opposition to the Plaintiffs' Motion to Strike was served on the attorneys of record for each party by U.S. Mail on March 1, 2006.

Alfred Gordon